<u>REMARKS</u>

This amendment is in response to the Office Action of May 18, 2005 in which claims 84-121 were rejected.

It is noted that the Office Action was mailed on May 18, 2005 which was five days after the Amendment was filed adding new claim 122. With this amendment we add new dependent claims 123-128 as well.

Independent claims 84 and 104 are rejected under 35 U.S.C. § 102(b) as being anticipated by Hedberg (WO 99/32960 A1). The claims 1-83 were cancelled and claims 84-128 are pending and for the reasons given below are new over the Hedberg reference. In particular, the second windowing signal limitation focuses on the capability to be able to move the detailed view shown on the right hand side in Fig. 3 which has been selected with the first windowing signal with *a scrolling motion*. This is described beginning at page 9, line 29 through page 10, line 8 of the present specification.

The publication WO 99/32960 can be considered as meeting the first input windowing signal, *but this same first input windowing signal is also used* (with the same degree of coarseness) for positioning the fixed pointer over a point of interest, such as a link, at which time a button is pushed to activate the link (see page 6, line 23 - page 7, line 6 corresponding to column 3, line 62 - column 4, line 12 of US 6,411,275 and the embodiment of Hedberg described at page 7, lines 7-29 of WO 99/32960, corresponding to column 4, lines 13-34 of US 6,411,275).

Thus, the user of the device shown in WO 99/32960 actuates a first button to sense movements of the device. The sensed movements are used to position the graphical information within the display. A fixed pointer can be positioned in this

way over the point of interest. Then a second button is actuated to activate the point of interest, such as a hyperlink, not for scrolling. It should be realized that the operation described by Hedberg would be somewhat difficult to carry out since the same coarse movements used to select the area of interest would also be used to control the positioning of the pointer over the point of interest without any secondary scrolling control as disclosed and claimed by the present applicants.

In the Hedberg reference there is no second input windowing signal indicative of scrolling. The presently claimed second input windowing signal is claimed as being distinct from the first, in order to permit scrolling, as distinguished from the first input windowing signal. Scrolling of course means the process of moving e.g. text or imagery across a display screen to create the effect of a viewing window moving on a large page of a document. An operator may scroll left, right, up, or down in a document. In other words, both vertically and horizontally or some combination thereof, i.e., angularly (see page 10, lines 7-8) such as in a "panning" motion. See also the enclosed definition of scrolling from the IEEE Standard Computer Dictionary (1990) at page 177.

The fact that the Hedberg reference can be used with a first input signal for selecting a portion of the full extent of available graphical information and then using a second input signal to increase or decrease the magnification by a zooming movement in an up and down (orthogonal) direction is not the same as scrolling because scrolling is different in kind from zooming. Zooming means to magnify the image to reveal more detail and the "scrolling" limitation of the present claims cannot fairly be "read" onto zooming. Zooming involves introduction of movement in a third dimension beyond the one or two-dimensional meaning of scrolling. It should also be pointed out that applicant has several dependent claims, at least dependent claims 86 and 106, covering the zooming feature as an additional feature over and above the scrolling feature. If the "scrolling" feature of the independent claims were to be interpreted as reading-on "zooming" it would make these dependent claims 86 and 106 inconsistent with the plain meaning of the claims from which they depend. Such an interpretation would conflict with

accepted principles of claim differentiation, *Phillips v. AWH Corp et al. (03-1264-1286 CAFC 2005)*.

Regarding the dependent claims rejected on the same ground, these all depend from the independent claims and are patentable for at least the reasons given above.

Withdrawal of the novelty rejection of claims 84-88, 90-93, 95-100, 102-108, 110-118 and 120-121 (and presumably 122) is requested.
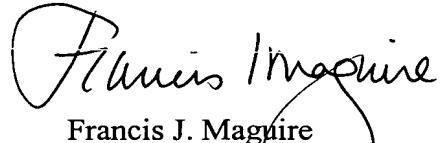
Regarding the obviousness rejection of claims 89 and 109, these either directly or indirectly depend from independent claims 84 and 106 and are at least patentable for the reasons given above and the withdrawal of the 35 U.S.C. § 102(b)/103(a) rejection thereof is requested.

Claim 94 is rejected under 35 U.S.C. § 103(a) as being unpatentably obvious over Hedberg and further in view of Flack et al (U.S. 6,288,704). Claim 94 depends from claim 91 which in turn depends from independent claim 84 which, as pointed out above, is patentably distinct from Hedberg and for that reason at least, claim 94 is nonobvious under 35 U.S.C. § 102(b)/103(a) and the rejection of claim 94 on that ground is requested.

Regarding the obviousness rejection of claims 101 and 119, these directly or indirectly depend from independent claims 84 and 104 which have been shown above to be patentable over Hedberg and claims 101 and 119 are therefore patentable at least for the same reasons under 35 U.S.C. § 102(b)/103(a) and withdrawal of the rejection thereof on that ground is requested.

The objections and rejections of the Office Action of May 18, 2005, having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of claims 84-128 to issue is solicited.

Respectfully submitted,

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IEEE Standard Computer Dictionary

A Compilation of IEEE Standard Computer Glossaries

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Abstract: _IEEE Standard Computer Dictionary: A Compilation of IEEE Standard Computer Glossaries,_ identifies terms currently in use in the computer field. Standard definitions for those terms are established.
Keywords: Glossary; terminology; definitions; dictionary.

scratch. (1) To physically erase data from its medium. [610.5]
(2) To logically delete the identification of data from its medium. [610.5]

scratch file. A file used as a work area to hold data temporarily. [610.5]

scratchpad area (SPA). A portion of computer memory shared by a set of computer programs or processes for some special purpose. For example, memory used by two programs for interprocess communication. [610.5]

screen editor. *See:* **full-screen editor.** [610.2]

scrolling. In word processing, the process of moving text across a display screen to create the effect of a viewing window moving on a large page of a document. An operator may scroll left, right, up, or down in a document. *See also:* **reverse scrolling.** [610.2]

SDD. (1) Acronym for **software design description.** [610.12]
(2) (DoD) Acronym for software design document. *See:* **software design description.** [610.12]

SDP. Acronym for **software development plan.** [610.12]

SDR. Acronym for **system design review.** [610.12]

SDS. Acronym for **sequential data set.** [610.5]

search. (1) The examination of a set of items to find all those having a desired property or properties. For example, to find all items in a file that meet some search criterion. [610.5]
(2) To examine a set of items as in (1). [610.5]
(3) To retrieve the results of an examination as in (1). [610.5]
(4) To retrieve the first item within a set of items as in (1). [610.5]

search argument. In a search, the value compared with the search key of each item in the set being searched. *See also:* **condition.** [610.5]

search criterion. In a search, the relationship that a search key must have to the search argument in order for the search to be successful. For example, "NAME equals 'SMITH;'" "SALARY greater than 10000." [610.5]

search cycle. That portion of a search that is repeated for each item in the set being searched. [610.5]

search key. In a search, the key within each item in the set being searched that is compared to the search argument. *Syn:* **seek key.** [610.5]

search language. * *See:* **query language.** [610.5]
* Deprecated.

search length. (1) For a node in a search tree, the number of nodes that must be examined in order to find that node. [610.5]
(2) For a search tree, the average search length as in (1) for all nodes in the tree. [610.5]

search tree. (1) A tree into which items in a set are placed in order for the set to be searched. The tree is traversed according to some searching algorithm, making key comparisons until the search argument is found or the algorithm is halted. For example, a B-tree. [610.5]
(2) A multiways tree of order m in which each nonterminal node may contain (m - 1) key values and each terminal node, called a leaf, contains associated data for one of the key values contained in its parent node. Each subtree is used to contain all the items with key values falling in the intervals formed by the key values contained in its root node. *See also:* B-tree; binary search tree; digital search tree. [610.5]

secondary access method. A collection of techniques designed to allow efficient access to all the target data or data records associated with a set of stated secondary key values in a query. [610.5]

secondary index. (1) A list associated with an inverted file in which entries in the list

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